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DOCKET FILE APPALACHIAN

February 1, 2006

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FEB - 1 2006

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Federal Communications Commission  
Office of Secretary

Re: CC Docket 94-102  
E911 Handset Penetration Quarterly Report  
East Kentucky Network, LLC d/b/a Appalachian Wireless

Dear Ms. Dortch:

On behalf of East Kentucky Network, LLC d/b/a Appalachian Wireless there is submitted herewith a report of the status of the carrier's progress in achieving 95% systemwide handset of location-capable handsets.

Appalachian Wireless is a Tier III digital wireless carrier operating cellular radiotelephone services in Kentucky RSAs 9 and 10. This report is submitted in compliance with the terms of the Order, CC Docket No. 94-102, FCC 06-02, released January 13, 2006, conditionally granting Appalachian Wireless An extension of the deadline through June 30, 2006, for compliance with Section 20.18(g)(1)(v) of FCC rules, 47 C.F.R. § 20.18(g)(1)(v) .

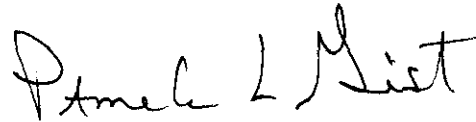
Pursuant to Sections 0.457(d) and 0.459 of FCC Rules, it is hereby requested that the information reported herein be treated by the Commission as confidential, and be withheld from public inspection. The information, which would not customarily be released to the public, is confidential commercial information, and should be protected in accordance with Sections 0.457(d) and 0.459 of FCC Rules.

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Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,

A handwritten signature in black ink that reads "Pamela L. Gist". The signature is written in a cursive style with a large, stylized "P" and "G".

Pamela L. Gist

**EAST KENTUCKY NETWORK, LLC D/B/A APPALACHIAN WIRELESS**

**E911 REPORT**

**FEBRUARY 1, 2006**

The following information is submitted in accordance with FCC directive:

**1. The number and status of Phase II requests from Public Safety Answering Points**

A total of thirteen PSAPs are located within Appalachian Wireless' service area. All have requested Phase II services, and all state that they their trunks and equipment are in place and that they are capable of receiving and utilizing Phase II data. Appalachian Wireless is working with all the PSAPs to deploy Phase II services, according to consented schedules.

Appalachian Wireless utilizes the services of Intrado to install and test the equipment necessary to transmit E911 data to PSAPs. Intrado coordinates with the PSAPs, operates the location database and optimizes E911 performance on Appalachian Wireless' CDMA network system. In preparation for Phase II, Intrado populated information in the Base Station Almanac for the Position Determining Equipment. The Base Station Almanac contains various information about Appalachian Wireless' cell sites and is crucial in the function of Phase II services. Intrado also loaded the values from the Almanac into Intrado's equipment, and became ready for testing.

The first Phase II test failed because of a 'link' failure between Intrado's Phase II equipment Appalachian Wireless' switch. This took time to resolve

because of the involvement of third parties necessary to correct this issue. A subsequent Phase II test did not pass because Appalachian Wireless' handset Electronic Serial Numbers had not been loaded properly. Additional data was compiled and submitted to Intrado so that Appalachian Wireless' ESNs could be used for the acquisition of Phase II data.

With resolution of the technical issues described above, Appalachian Wireless has produced a good Phase II test, i.e., it has successfully placed a Phase II phone call. Appalachian Wireless will now coordinate with Intrado to load the PSAPs' data and place the PSAPs on Phase II service. Appalachian Wireless will drive test the network to check Phase II accuracy.

## **2. The dates on which Phase II service has been implemented or will be available to PSAPs served by Appalachian Wireless' wireless network**

Twelve of the thirteen PSAPs will likely be Phase II operative by the end of February 2006. A thirteenth PSAP, Dickenson County, Virginia will take longer. To deploy Phase II services there, Appalachian Wireless must first establish connectivity to the selective routers that serve Dickenson County. Phase II services should become active in Dickenson County in about June 2006.

All thirteen of the PSAPs have consented to Appalachian Wireless' schedule for deployment of Phase II services.

## **3. The status of coordination efforts with PSAPs for alternative 95% handset penetration dates**

Appalachian Wireless is actively working with the PSAPs to keep them informed of the carrier's progress in achieving higher location-capable handset

penetration rates. Jamie Thacker is Appalachian Wireless' appointed E911 coordinator. Mr. Thacker has spoken with each of the thirteen PSAPs to report progress on Phase II deployment and the penetration figure for location-capable handsets. The response of each PSAP has been positive. No PSAP has expressed objection to the projected schedule.

#### **4. Efforts to encourage customers to upgrade to location-capable handsets**

Appalachian Wireless has adopted a plan to notify customers as to which PSAPs located within Appalachian Wireless' service area are capable of receiving and processing the Phase II E911 data that is being delivered to them by Appalachian Wireless, and when the other PSAPs are expected to become capable. By means of billing inserts, print advertising and website postings, customers will be informed that by upgrading their handsets they will have the ability to automatically transmit their location information to emergency officials when they call 911.

At the same time, Appalachian Wireless' promotional campaigns to encourage handset upgrades have been conducted in print ads, by direct mail and billing inserts, and on television and radio. Special offers are promoted on the company's web site and by signage on premises. The ads emphasize the benefit of early renewal for TDMA and analog customers who trade in the old handsets. The campaigns offer free phones on a buy-one-get-one-free basis, on a buy-two-get-a-third-free basis, and in association with the purchase of specified numbers of minutes. Promotions for phones with cameras, ringtones, color screens and other features are used to lure customers into upgrading their handsets. Now Phase II

services are about to be launched, the ad campaigns will begin to advertise the safety and coverage advantages of the CDMA system, and emphasize as a feature of the new phones their location assistance capabilities in the event of emergency.

**5. The percentage of customers with location-capable phones**

As of December 31, 2005, approximately 85% of Appalachian Wireless' subscribers were using Phase II location-capable handsets. The percentage rate has risen six percentage points over the last three months.

**6. Status in achieving compliance and whether Appalachian Wireless is on schedule to meet its revised 6/30/06 deadline**

Appalachian Wireless maintains its policy of selling and activating only location-capable digital handsets. It continues to improve its CDMA network facilities and to conduct marketing campaigns to encourage consumer adoption of new handsets. The penetration rate of location capable handsets is increasing, and Appalachian Wireless expects to be compliant no later than June 30, 2006.

APPALACHIAN WIRELESS

**Penetration Levels of Location-Capable Phones**

